

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS FRANK NERI  
(APWU/USPS-T4-1-13)  
(December 29, 2011)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Frank Neri (USPS-T-4). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T4-1 On page 15 of your testimony you state that operations would no longer be constrained by AADC/ADC distinctions because all facilities would be separated on an outgoing primary sort. Does this mean that the Postal Service would require all presorted mail to be sorted to a finer level than the AADC/ADC levels?

APWU/USPS-T4-2 On page 16 of your testimony you state that the proposed network and relaxed expectations of overnight service would “narrow the 2-day delivery range and enlarge the 3-day delivery range, which is anticipated to generate significant improvement in operating efficiency.” Since the measure of customer expectations is keyed to actual mail delivery rather than service standard day ranges please provide the following information.

- a) What percentage of First Class mail is actually delivered in one day now?
- b) What percentage of First Class mail is actually delivered in two days now?
- c) What percentage of First Class mail is actually delivered in three days now?
- d) What percentage of First Class mail would be expected to actually be delivered in two days under the proposed plan?
- e) What percentage of First Class mail would be expected to actually be delivered in three days under the proposed plan?
- f) What percentage of Periodical mail is actually delivered in one day now?
- g) What percentage of Periodical mail is actually delivered in two days now?
- h) What percentage of Periodical mail is actually delivered in three days now?
- i) What percentage of Periodical mail would be expected to actually be delivered in two days under the proposed plan?
- j) What percentage of Periodical mail would be expected to actually be delivered in three days under the proposed plan?

APWU/USPS-T4-3 What impact would the proposed plan have on the actual delivery profile of Priority Mail compared to its actual delivery profile now?

APWU/USPS-T4-4 What impact would the proposed plan have on the actual delivery profile of Express Mail compared to its actual delivery profile now?

APWU/USPS-T4-5 What impact would the proposed plan have on the actual delivery profile of Standard Mail compared to its actual delivery profile now?

APWU/USPS-T4-6 What impact would the proposed plan have on the actual delivery profile of parcels compare to the actual delivery profile now?

APWU/USPS-T4-7 On page 16 of your testimony you state “presorted First-Class Mail for a mail processing facility’s service area, entered by commercial mailers at co-located BMEU facilities (that is, BMEUs located at mail processing facilities) which meet the CAT at the co-located BMEU and the CET at the mail processing facility would be processed for the next day’s delivery.”

- a) Would this mail need to be presorted to the 5-digit level for the facility’s service area to qualify?
- b) What percentage of current presorted First-Class Mail do you estimate would qualify for this treatment?
- c) What percentage of current commercial customers of presorted First Class mail do you estimate would be able to meet these requirements?
- d) Is this exception to the normal delivery standards applicable to only certain customers’ First Class mail consistent with Title 39 §403 (c)?

APWU/USPS-T4-8 On page 18 of your testimony you state that this “environment would also impact flat-sized mail sortation as depicted in the table below.” Does this table indicate what proportion of mail would need to be finalized using a second pass? If not, please provide an explanation of this table.

APWU/USPS-T4-9 On page 22 of your testimony you indicate that “it is imperative that the Postal Service reduce on-hand [mail processing equipment] by repositioning and/or disposing of it.”

- a) Is there anything that currently prevents the Postal Service from repositioning or disposing of mail processing equipment that it no longer needs in a specific location?
- b) What steps are currently followed to recover the investment value of excess mail processing equipment?
- c) For each of the P&DCs that have been closed since 2008, what has been done with the equipment in that location?
- d) For each of the P&DCs that have been closed since 2008, what has been done with the building?

APWU/USPS-T4-10 In determining how much equipment will be needed in the future, more consolidated, mail processing network, how much equipment redundancy is being built in to ensure that service standards can be met despite inevitable machine downtime?

APWU/USPS-T4-11 Please provide a description of the information and analysis that you used to determine the productivity percentages presented in Figure 12 on page 29.

APWU/USPS-T4-12 Please explain how redundant registry operations will produce a 50 percent improvement in productivity while redundant platform operations will only produce a 25 percent improvement in productivity.

APWU/USPS-T4-13 Manual operations only show a 3 percent productivity improvement. To what extent are manual operations driven by mail pieces that must meet their service standard but have missed their processing window?